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*Attorneys for Camino Real Chevrolet, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	
GENERAL MOTORS CORP., <i>et al.</i>	:	Case No. 09-50026 (REG)
	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
-----	X	

**PROTECTIVE OBJECTION OF CAMINO REAL CHEVROLET, INC.  
TO DEBTORS' PROPOSED CURE AMOUNTS**

Camino Real Chevrolet, Inc. ("Camino Real Chevrolet") files this protective objection regarding cure amounts proposed by the Debtors with respect to executory contracts they propose to assume and assign. In support of its protective objection, Camino Real Chevrolet states as follows:

1. Camino Real Chevrolet is a party to an executory contract with one or more of the Debtors.

2. By Notice dated June 5, 2009 (the "Assumption Notice"), the Debtors informed certain suppliers of goods and services of their intent to assume and assign executory contracts and of the cure amount, if any, that must be paid by the Debtors in connection therewith.

3. Camino Real Chevrolet may or may not have received a copy of the Assumption Notice. Camino Real Chevrolet is filing this protective objection in an abundance of caution in the event that the Debtors intend to assume and assign Camino Real Chevrolet contracts but scheduled a cure amount with which Camino Real Chevrolet does not agree.

4. Camino Real Chevrolet will work diligently with the Debtors to try to resolve any cure amount issues without Court intervention but reserves all rights in the event that an agreement cannot be reached.

Dated: June 19, 2009

Respectfully submitted,

VENABLE LLP

/s/Edward A. Smith

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